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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Access Reform Tariff Filings

) 97-249  
) 97-250  
)  
DEC 29 1997  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REPLY OF THE CITIZENS TELECOMMUNICATIONS COMPANIES  
TO PETITION OF AT&T CORP.**

The Citizens Telecommunications Companies ("CTC"), by their attorney, hereby reply to the December 23, 1997 Petition of AT&T Corp. addressing the access reform tariff filings (the "AT&T Petition") of price cap regulated local exchange carriers ("LECs").

I. Introduction

A. The Tariff In Question

The CTC tariff addressed in the AT&T Petition is Transmittal No. 42, filed December 17, 1997. CTC made a revised filing on December 19, 1997, Transmittal No. 43. CTC's reply to the AT&T Petition will make certain references to Transmittal No. 43.

B. The AT&T Petition Is Extremely Vague

With a few exceptions, the AT&T Petition does not appear to address CTC issues. CTC finds responding to the AT&T Petition to be difficult because of the paucity of CTC-specific references and the great abundance of references to price cap carriers as a genera. Nonetheless, CTC will respond to every CTC-specific contention and attempt to address those generic contentions that may (or may not) have relevance to CTC.

II. The Allegation of Failure To Establish The Required Multiplexing Elements Between Tandem Switches And Serving Wire Centers

This allegation is demonstrably incorrect as applied to CTC. See 10th Revised Page 761, Transmittal No. 43, which establishes discrete multiplexing charge elements.<sup>1</sup>

III. The Variance Between LECs' Rates For The Non-Traffic Sensitive Portion Of Local Switching

CTC, as a group of rural telephone companies, as defined in Section 3(37) of the Communications Act of 1934, as amended, 47 U.S.C. § 153(37), cannot be compared to the more typical price cap carrier in matters of cost. As carriers primarily serving rural America, the CTC LECs lack the economies of scale achieved by carriers serving more populous areas. CTC's rates for ports may be higher than those of other price cap LECs for a very simple reason -- their costs are higher.

IV. CTC 2 Did Not Publish A PRI ISDN Rate

The LECs comprising the CTC 2 group have no demand for PRI ISDN services.

V. CTC Eliminated Business Multi-Line Counts From Its Total EUCL Counts

An idiosyncrasy of the TRP led to the illusion that CTC eliminated MLBs from its 1997 EUCL counts in the current tariff filing. However, it is just an illusion; there has been no change in total MLBs between the July 1 and December 19, 1997 filings. Exhibit 1 graphically proves the point. There is, in fact, a discrepancy of four lines for CTC 1 between the July 1 and December 19, 1997 filings. This discrepancy is immaterial and does not affect any rates.

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<sup>1</sup> See also 9th Revised Page No. 761, Transmittal No. 42.

VI. The Disparity Between The LECs' Non-Primary Residential Line Counts


Again, CTC is *sui generis*. Its non-primary residential line counts are what its records show and reflect that secondary residential lines have not penetrated rural America to the extent found in more urbanized areas.

Conclusion

For all of the foregoing reasons, the AT&T Petition, to the extent that it addresses the CTC access reform tariff filing, should be denied.

Respectfully submitted,

THE CITIZENS TELECOMMUNICATIONS  
COMPANIES

By:   
Richard M. Tettelbaum, Associate General  
Counsel

Citizens Communications  
Suite 500, 1400 16th St., N.W.  
Washington, D.C. 20036

(202) 332-5922

December 29, 1997

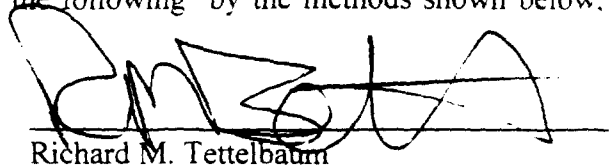
**Exhibit 1**

## Citizens Telecommunications Companies

	<u>7/1/97 Filing</u>	<u>12/19/97 Filing</u>	<u>12/19/97 Filing</u>
	CTC Wkst	CTC Wkst	CTC TRP
<b><u>CTC1</u></b>			
<b>Multiline Business</b>	764,730	764,730	764,263
Multiline Bus.	672,324	672,324	764,263
ISDN - BRI	471	471	-
ISDN - PRI	1	1	-
Public Payphone	55,341	55,341	-
Semi-Public Payphone	8,618	8,618	-
COCOTS	27,975	27,975	-
<b>Single Line Business</b>	1,096,420	1,096,420	-
<b>Residential</b>			
Primary Residential	6,658,294	6,453,796	7,550,216
Non-Primary Residential	-	204,498	204,969
Lifeline	23,623	23,623	23,623
ISDN - BRI	-	-	-
<b>Special Access Surcharge</b>	1,191	1,191	1,191
<b>Total Lines</b>	8,544,258	8,544,258	8,544,262
Difference TRP to Wkst			4
<b><u>CTC2</u></b>			
<b>Multiline Business</b>			
Multiline Bus.	168,309	168,309	191,423
ISDN - BRI	7	7	-
ISDN - PRI	-	-	-
Public Payphone	12,829	12,829	-
Semi-Public Payphone	1,528	1,528	-
COCOTS	8,757	8,757	-
<b>Single Line Business</b>	168,948	168,948	-
<b>Residential</b>			
Primary Residential	1,027,012	997,359	1,166,307
Non-Primary Residential	-	29,653	29,710
Lifeline	5,904	5,904	5,904
ISDN - BRI	50	50	-
<b>Special Access Surcharge</b>	61	61	61
<b>Total Lines</b>	1,393,405	1,393,405	1,393,405
Difference TRP to Wkst			-

Certificate of Service

I, Richard M. Tettelbaum, Associate General Counsel for Citizens Utilities Company, certify that copies of the foregoing "Reply of the Citizens Telecommunications Companies to Petition of AT&T Corp." have been served upon the following by the methods shown below, this 29th day of December, 1997.



Richard M. Tettelbaum

By hand:

International Transcription Service, Inc.  
2100 M Street, N.W.  
Suite 140  
Washington, D.C.

Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Suite 1600  
Washington, D.C. 20554

Chief, Competition Division  
Federal Communications Commission  
2033 M Street, N.W.  
Suite 1400 D  
Washington, D.C. 20554

Chief, Tariff and Price Analysis Branch  
Competitive Pricing Division  
Federal Communications Commission  
1919 M Street, N.W.  
Suite 1600 C1  
Washington, D.C. 20554

By telecopy:

Safir Rammah, AT&T  
(703) 691-6414

By U.S. Mail:

Gene C. Shaerr  
Scott M. Bohannon  
Carl D. Wasserman  
Rudolph M. Kammerer  
1722 I Street, N.W.  
Washington, D.C. 2006

Mark C. Rosenblum  
Peter H. Jacoby  
Judy Sello  
AT&T Corp.  
Room 3245II  
295 North Maple Avenue  
Basking Ridge, NJ 07920